ORIGINAL

Supreme Court, U.S.
FILED
JUN 13 1994
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IN THE
SUPREME COURT OF THE UNITED STATES

Nos. 93-1833 and 93-1955

CITIZENS FOR TERM LIMITS,

Petitioner,

v.

THOMAS FOLEY, et al.,

Respondents.

CHRISTINE O. GREGOIRE, et al.,

Petitioners,

v.

SUSAN THORSTED, et al.,

Respondents.

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On Petitions for a Writ of Certiorari
to the United States Court of Appeals
for the Ninth Circuit

RESPONSE TO MOTIONS TO EXPEDITE CONSIDERATION

Petitioners in both these cases seek to advance consideration of their petitions for certiorari before judgment in the Court of Appeals, and to have this Court review the constitutionality of a Washington law restricting ballot appearances of multi-term congressional incumbents. A very similar provision was held unconstitutional by the Supreme Court of Arkansas, a judgment which is before this Court in Nos. 93-1456 and 93-1828.

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U.S. Term Limits, Inc., respondent here, is also petitioner in the Arkansas case, No. 93-1456. For the reasons stated in U.S. Term Limits' response to the present petitions (filed today), the two cases are so similar that there appears no compelling reason to grant certiorari before judgment to add the Washington petitions to the Arkansas ones. The Washington ruling does, however, underscore the national impact of this issue and the need for this Court's prompt consideration and review of the Arkansas decision.

CONCLUSION

For the reasons stated, the motions to expedite should be denied.

Respectfully submitted,

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June 13, 1994

CERTIFICATE OF SERVICE

I certify that I have this 13th day of June 1994 caused one copy of the foregoing Response to Motions to Expedite Consideration to be deposited in the U.S. mail, first-class postage prepaid, and also sent by fax, addressed to each of the following:

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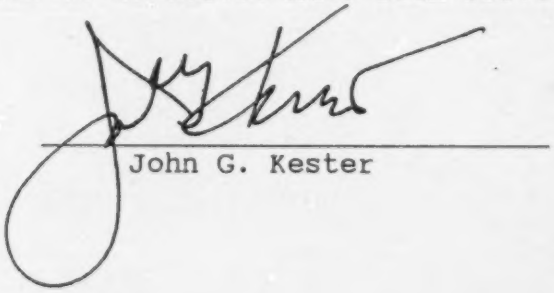
All parties required to be served have been served.



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